

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

EXHIBIT

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DANIEL GRAND,)

Plaintiff,)

-V-) CASE NO. 1:22CV01594

CITY OF UNIVERSITY HEIGHTS,) JUDGE BRIDGET

OHIO, et al.,) MEEHAN BRENNAN

Defendants.)

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The deposition of RAKHEL DAVIDOFF, a witness herein, being called by the Defendants as if upon cross-examination under the statute, and taken before Megan A. Pisciotta, a Notary Public within and for the State of Ohio, pursuant to the agreement of counsel, on Wednesday, December 6th, 2023, at 10:00 a.m., at the Law Offices of Mazanec Raskin & Ryder, 100 Franklin's Row, 34305 Solon Road, City of Solon, County of Cuyahoga, and the State of Ohio.

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1 **was?**

2 A. No.

3 **Q. I take it those were handled by Mr. Grand?**

4 A. Yeah.

5 **Q. Okay. Did you participate in any of the**
6 **conversations or communications in attempt to resolve**
7 **those?**

8 A. To resolve the violations?

9 **Q. Yes.**

10 A. No.

11 **Q. So any information that you would have would be**
12 **based on what he told you? In other words, you have no**
13 **firsthand information about the resolution of those**
14 **issues?**

15 A. Yeah. I mean, if people came to the house to
16 take pictures or whatever, that I dealt with, but I
17 didn't deal with resolutions or anything like that.

18 **Q. Do you have any recollection of those instances**
19 **in which people came to your house to take pictures?**

20 A. I don't remember names, but somebody came to
21 take a picture of the outside, like the driveway area
22 that was an issue, and the person who came to take -- to
23 look at everything to give, I guess, the final
24 inspection of the house. I don't recall who was who.

25 **Q. Okay. Gotcha. Did you ever gain any**

1 information as to the employer or organization of the
2 person who came to take pictures of the driveway?

3 A. Meaning, like his name?

4 Q. Who they were employed by?

5 A. The city.

6 Q. They identified themselves as a city employee?

7 A. Yeah.

8 Q. Okay. So what happened when the person came to
9 take pictures of the driveway?

10 A. I let them take pictures.

11 Q. You allowed them to take pictures?

12 A. Uh-huh.

13 Q. Okay. Where did they go in order to take these
14 photos?

15 A. Of the driveway? Just to that front driveway
16 area.

17 Q. And this is an area in front and to the side of
18 your house?

19 A. Uh-huh.

20 Q. I believe to the right side as you face the
21 house?

22 A. Yeah.

23 Q. Okay. Did they go beyond the areas that could
24 be viewed, for lack of a better word, from the street?

25 A. I can't say for sure because I wasn't outside

1 monitoring them. They knocked on the door, I answered,
2 and said, sure, and he did what he had to do, but I
3 didn't watch him while he was doing it.

4 **Q. Okay.**

5 A. So I don't know if at any point in time he went
6 someplace else like to the left side of the house or
7 anywhere else.

8 **Q. Fair enough. The full area of your driveway can**
9 **be viewed from the street, if I recall correctly?**

10 A. Yes.

11 **Q. And I think you indicated that you were also**
12 **present when a final house inspection occurred?**

13 A. I think so, yeah.

14 **Q. Okay.**

15 A. I don't think it was the final one, but it was
16 one of them. One of the inspections.

17 **Q. Okay. And did you permit the inspector to do**
18 **the inspection?**

19 A. Yeah.

20 **Q. Where did that occur?**

21 A. Everywhere.

22 **Q. Inside the house, throughout the house?**

23 A. Yeah.

24 **Q. But that was with your permission?**

25 A. Yeah.

1 firm with which I am affiliated, under a contract as
2 defined in Civil Rule 28(D).

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4 IN WITNESS HEREOF, I have hereunto set my hand and
5 affixed my seal of office at Cleveland, Ohio on December
6 19th, 2023.

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11 Megan A. Pisciotto, a Notary Public

12 In and for the State of Ohio.

13 My Commission expires 9/21/28
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